

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOR 680 MADISON AVE. LLC,	:	CASE NO. 1:17-cv-08528 (PGG) (JLC)
	:	
Plaintiff,	:	
	:	
v.	:	JOINT STIPULATION REGARDING
	:	DISCOVERY DEADLINES AND
QATAR LUXURY GROUP S.P.C., AND	:	ORDER
QATAR FOUNDATION FOR	:	
EDUCATION, SCIENCE AND	:	
COMMUNITY DEVELOPMENT,	:	
	:	
Defendants.	X	

Pursuant to the Court’s Individual Rules of Practice, Rule I.D., the parties hereby jointly stipulate to extend and amend certain discovery deadlines, as set forth below. The parties previously requested extensions to these deadlines on September 24, 2018, November 20, 2018, and February 15, 2019. The parties have diligently engaged in discovery thus far. Defendant Qatar Luxury Group S.P.C. (“QLG”) wrote to Magistrate Judge Cott last week about discovery disputes relating to documents; plaintiff’s response is due today. Those disputes will not be resolved prior to the current close of fact discovery on March 25, 2019.

Additionally, the need, if any, for expert discovery, and the scope thereof, may be impacted by the Court’s resolution of the parties’ anticipated summary judgment motions regarding the damages remedies available to plaintiff, and whether the conditions in the guaranty which limit QLG’s liability have been satisfied. Each party believes that these issues are capable of summary judgment resolution in their favor. As well, the Court’s decision on the summary judgment motions may also facilitate pre-trial settlement. In the interests of judicial efficiency and economy, the parties agree that the discovery schedule should be modified as follows, which proposed

schedule anticipates that expert discovery should be deferred until determination of the summary judgment motions. The parties agree that the requested extensions are appropriate to allow the parties to complete discovery and prepare the case for dispositive motions, and settlement and/or trial, and are not requested for any dilatory purpose.

The parties therefore jointly stipulate and respectfully request that the discovery deadlines established in the February 15, 2019 request to extend discovery deadlines (Docket # 49) be extended or amended as follows:

Event	Date in February 15, 2019 Letter (Docket #49)	Requested Date
Complete fact discovery relating to issues pending before Magistrate Judge Cott (fact discovery is otherwise complete)	March 25, 2019	30 days after discovery disputes are resolved by court order
Post-discovery dispositive motion letter(s)	April 8, 2019	21 days after fact discovery closes
Opposition to post-discovery dispositive motion letter (s)	April 15, 2019	10 days after post-discovery dispositive motion letter
Party-proponent expert disclosures	March 18, 2019	45 days after summary judgment motions are decided
Party-opponent expert disclosures	April 1, 2019	30 days after party-proponent expert disclosures
Complete expert discovery	April 19, 2019	21 days after party-opponent expert disclosures

Dated: March 25, 2019

SQUIRE PATTON BOGGS (US) LLP

By: /s/ Aneca E. Lasley
 Aneca E. Lasley
 Christopher F. Haas
 Squire Patton Boggs (US) LLP
 2000 Huntington Center

MATALON ♦ SHWEKY ♦ ELMAN PLLC

By: /s/ Joseph Lee Matalon
 Joseph Lee Matalon
 Barbara Shweky
 450 Seventh Avenue, 33rd Floor
 New York, New York 10123

41 South High Street
Columbus, OH 43215
Telephone: 614-365-2700
Facsimile: 614-365-2499
Email: aneca.lasley@squirepb.com
Email: christopher.haas@squirepb.com

(212) 244-9000
Email: jlm@trial-lawyer.org
Email: bshweky@trial-lawyer.org

*Attorneys for Plaintiff
Thor 680 Madison Ave LLC*

Stephanie E. Niehaus
Squire Patton Boggs (US) LLP
30 Rockefeller Plaza, 23rd Floor
New York, New York 10112
Telephone: (212) 872-9800
Fax: (212) 872-9815
E-mail: Stephanie.niehaus@squirepb.com

*Attorneys for Defendant Qatar Luxury Group,
S.P.C.*

SO ORDERED.

James L. Cott
United States Magistrate Judge